

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

\*\*\*\*\*  
Civil Action File No.  
NOTICE OF COMPLAINT:

The Plaintiff Demands A Jury Trial

Dr. Ronald A. Nurse AAS, BS, MS, Ph.D. AACD-P  
Plaintiff

Vs

Capella University

Dr. Lisa Faille (Hearing Chair)

Dr. Craig Marker

Dr. Kristi Mueller

Dr. Andrea Murray

Dr. Constance St. Germain

Dr., Ashley Poklar Ph.D.

Dr. Jennifer Raymer, PhD.

Dr. Gerry Koocher Ph.D.

Dr. Danny Sharara Ph.D.

Email: Danny.Sharara@capella.edu

225 South 6th Street, 9th Floor, Minneapolis, MN 55402

Tel. No.: (888) 227-3552

Email: oacs@capella.edu

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Ms. Michelle Adams

Braveheart Counseling

3524 Jefferson Davis Hwy.

Graniteville, SC 29829

Email: madams@braveheartcounseling.online

Tel. No.: 803-380-9004

Defendants

To: Clerk of the Court

Columbia

Matthew J. Perry, Jr. U.S. Courthouse

901 Richland Street

Columbia, South Carolina 29201

From: Dr. Ronald A. Nurse AAS, BS, MS, Ph.D. AACD-P

142 Claridge Street

North Augusta, SC. 29860

Tel. No.: (706) 993-7088 or (803) 686-4022

Email: emciedu@gmail.com

## **JURISDICTION AND VENUE**

- I. Plaintiff who is a male, African American, 69 ½ years of age, brings this action under the following:**
  - A. Title VI of the Civil Rights Act of 1964 (Title VI)** and its implementing regulations, at 34 C.F.R. Part 100 which prohibits discrimination on the basis of race, color, or national origin by Law Enforcement Officers and Agencies.
  - B. Age Discrimination Act of 1975 (the age act).** 42 U.S.C. 6101, and its impending regulation at, 34 C.F.R. Part 110. The Age Act prohibits discrimination on the basis of age by Law Enforcement Officers and Agencies.
  - C. The Defendants violated the Plaintiff's, Eighth Amendment under the Constitution of the United States of America which decrees in edicts:** "Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted." The Eighth Amendment (Amendment VIII) to the United States Constitution is the part of the United States Bill of Rights (ratified December 15, 1791) prohibiting the defendants from imposing excessive bail, excessive fines, or cruel and unusual punishments, including torture.
  - D. The defendants are charged with committed misfeasance.**  
The defendants are charged with violating [2003 c 111 § 1407; 1984 c 170 § 1; 1975-'76 2<sup>nd</sup> ex.s. c 47 § 1; 1965 c 9 § 29.82.010. Prior: 1913 c 146 § 1; RRS § 5350. Former part of section: 1913 c 146 § 2; RRS § 5351, now codified in RCW 29.82.015. Formerly RCW 29.82.010.]
  - E. The defendants are charged with embezzlement, scamming, deceptive practices, and fraud.**  
The defendants are charged with violating 18 U.S. Code CHAPTER 31-EMBEZZLEMENT AND THEFT and 18 U.S. Code CHAPTER 47 – FRAUD AND FALSE STATEMENTS
  - F. The defendants are charged with slander, libel, and assailing.**  
The defendants are charged with violating 28 U.S. Code § 4101. Definitions
  - G. The defendants are charged with unfair, unethical, illegal, and unlawful business practices.**  
The defendants are charged with violating EX-14 3 dex14.htm CODE OF BUSINESS CONDUCT AND ETHICS and Chapter 1 (commencing with Section 17500) of Part 3 of Division 7 of the Business and Professions Code.
  - H. 42 U.S. Code § 12203 – Prohibition against retaliation and coercion.**

**I. 2023 South Carolina Statutes - 120B.22 VIOLENCE PREVENTION; BULLYING.**

**J. The Defendants are in direct violation of South Carolina's Mandated Reporter Statutes:**

SECTION 63-7-310. Persons Required To Report:

Section 63-7-10 20-7-480 63-7-20 20-7-490 63-7-30 20-7-500 63-7-40 20-7-85.

Informed consent in the academia milieu and confidentiality protections are a priority.

Mental Health Counselors (MHC) must decide when it is appropriate to break confidentiality for the protection and welfare of peoples' lives. Helping professionals are Mandated Reporters. Psychologists and mental health counselors are obligated by Codes of Ethics and South Carolina State laws to disregard informed consent in the professorship relationship and confidentiality rights when protecting students from being harmed by others (Koocher, 2008).

Koocher, G. P. (2008). Ethical challenges in mental health services to individuals and families. *Journal Of Clinical Psychology*, 64(5), 601-612.

The Defendants are in direct violation of the following Code of Ethics: American Counseling Association, American Mental Health Counseling Association, American Psychological Association and Association for Multicultural Counseling and Development; *Ethical Principles of Psychologists and Counselors Code of Ethics Professional Conduct*:

Standard 3.04 Avoiding Harm:

(a) Psychologists take reasonable steps to avoid harming their clients/patients, students, supervisees, research participants, organizational clients, and others with whom they work, and to minimize harm where it is foreseeable and unavoidable.

- The Defendants are in direct violation of the following: *"Belmont Report Principles: Office of the Secretary: Ethical Principles and Guidelines for the Protection of Human beings:*
  - 1. Respect for Persons. Respect for persons incorporates at least two ethical convictions: first, that individuals should be treated as autonomous agents, and second, that persons with diminished autonomy are entitled to protection.
  - 2. Beneficence. -- Persons are treated in an ethical manner not only by respecting their decisions and protecting them from harm.
  - 3. Justice. -- An injustice occurs when some benefit to which a person is entitled is denied without good reason.

I Dr. Ronald A. Nurse, AAS, BS, MS, Ph.D., AADC-P am a 69-year-old male, African American. I am filing this formal civil complaint against Capella University; including the following employees who are listed above as defendants. This complaint is by far the worst and most derogatory case of equivocal educational fraud, scamming, Nazi Racism, and discrimination that can be imagined in any academia milieu. If you look at complaints on the internet you will see that Capella University has a strong habit of robbing and scamming students' student loan

monies (See Exhibit A). What Capella did to me and to so many other students is they make you take all the courses to complete a degree. Then when they exhaust all the student loans out of the student, they kick them out of the school after they have completed the course, without a degree (See Exhibit A and B). This horrible and heinous practice by Capella must be criminalized and penalized. They operate like they are above the law and can do despicable subhuman crimes against people because no one has stopped their atrocities. Vice President Kamala Harris at her rallies, complained about fake and phony schools like Capella University scamming students out of millions of dollars of Federal Student Loan dollars. The devastation to students is multiphasic. They are left with 100s of \$1000s of dollars in debt. Victims cannot get bubble gum on credit because they do not have degrees that they earned. As a result, the victims cannot find employment; this remands them into default and their credit is ruined.

I attended Capella University for 11 straight years. Throughout the whole time, I maintained an A-Grade / 4.00 GPA for 11 years. (See Exhibit B). I invested a fortune with Capella into my education; almost \$500,000.00. If you check the classrooms 90% of the time, I was the first student to post; never posted late; nor missed an assignment for 11 years. I made the President's list 45 times and earned 45 badges. I have what is called a "Round Robin." I have an AAS, BS, MS, Ph.D. AADC-P.; all my higher education degrees were earned with an A-Grade / 4.00 GPA. (See Exhibit B). Now, suddenly, I do not deserve to have an education or a job. They have to PAY.

The racism I experienced at Capella was prolific, vicarious, and despicable. I attended a Residency at Capella. Dr. Polkar antagonized and terrorized the whole classroom when she made racist and derogatory remarks about me as a Black man. She stated, "You ought to know what it is like to go to jail; you are a Black Man." She also decreed, "I live in a small and quiet town where a river runs through the middle of the streets, and we have no crime because there are no Black people." This shocked and traumatized all my classmates, who were surprised that Dr. Polkar made those heinous statements to me. Some students attested they could not believe what they heard.

I earned an A grade; 4.00 GPA in Dr. Polkar's class. On the Blackboard, my grades listed below add up to an A – grade average.

<b>Assignments</b>	97.69%	765.50 / 800.00
<b>Discussions</b>	100%	100.00 / 100.00
<b>Turnitin Draft</b>	N/A	0.00 / 0.00
<b>Total</b>	98.17%	865.50 / 900.00

Dr. Polkar proved how racist and discriminatory she was because she posted a B grade on my transcript. Yes, she hated me so much that she posted a B grade in my portal although I earned an A grade; 4.00 GPA. (See Exhibit B). This incident augmented emotional stress, psychological trauma, and ruined in my life.

Capella University and their racist employees conspired and discriminated against me while setting me up for failure. Twice, Capella made me complete full-term licensure courses and when I completed their classes to graduate; after they stole all of my money, they discharged me out of the two schools for no good reasons. The first time I completed all the courses for the "Mental Health-Licensure Professional Counseling" degree. After I completed all the courses in two years for the LPC degree, Capella kicked me out of school with no degree. When I inquired about being discharged although I had an A grade; 4.00 GPA, I was told that Black males are not allowed to be LPCs. The person decreed to me, "Search the internet and see if you can find a Black male LPCs." The person told me to take the "Clinical Psychology Licensure Course," Like a dame fool I took his advice and spent another two years of hard work and completed the "Clinical Psychology Licensure Course," with an A grade; 4.00 GPA. And again, Capella waited until I completed all of the courses in "Clinical Psychology Licensure Course," program and discharged me without a degree. You are educated, so you know how much hard work goes into earning a degree. They must pay.

This racist incident was so demented, dilapidated, devastating, and hypocritical, it is one for precedent and the record books. Capella discharged me from school for no good reason again when I completed all class to graduate. If this incident did not happen to me, I would not believe it much less comprehend that such vicious, mean, nasty, vile, lowdown, dirty racism could exist. The defendants are not human; they have subhuman abnormal cognitive processes and very underage inappropriate behaviors. They have no business being in an academic milieu collecting student loan money from the government.

Capella conspired against me and set me up with a fake false practicum. Capella referred me to Brave Heart Counseling. They actually still have Brave Heart Counseling listed as a practicum site in their portal. (See Exhibit C). Capella knew the Supervisor; Michelle Adams was mentally ill because other students complained about her, and they sent me to her anyway. When I came to work with a suit and tie, Michelle told me to dress like a homeless bun. The Supervisor was behaving abnormally. She came to work in her pajamas and bedroom slippers; her office was so filthy you would not put a pig in there. She had a foul order. Every day I came to work, she told me to go home. Michelle did not supervise me for one minute. When I asked the supervisor why she was exhibiting severe abnormal cognitive processes and extremely underage inappropriate behaviors, she attested that she had a DSM-5 mental illness. She stated to me, "I hate Black Men, I just make money off of your criminal asses." To this day I do not know what she meant; I am not a criminal. I emailed the Psytrainer and requested that the Practicum be rescinded because the Supervisor refused to Supervise me because she decreed that she had a mental illness. There was no Practicum experience with Michelle.

I interviewed with the supervisor at least two months prior to the commencement of the Practicum. At that time, I gave her all my credentials including a resume, transcripts, letters of recommendations, and a criminal background check. The Supervisor had more than enough ample time to reject the student's credentials and not board him into her agency. Counseling is a profession like any other practice. No company in their right mind is going to hire a professional without vetting him.

A hospital is not going to wait until a heart surgeon is operating on a table and decree, your degree is phony. A law firm is not going to wait until a lawyer is in the middle of a trial and then attest, your law degree is fake. No company, even Walmart is not going to hire without vetting the employees first. Any Human Resource Director will concur with me that the Supervisor's actions were abnormal. I emailed Psytraing to rescind the Practicum. She did not supervise me for one minute. This looked like a set up. Capella kicked out of school because Michelle told them she did want to supervise a Black Man.

Even though now, Capella presently knows that Brave Heart's Supervisor is mentally ill and stated to me "I hate Black students" they still have her as a viable listed practicum site in the Capella Internship finder Portal. (See Exhibit C). Capella knew this lady destroys people's lives with her mental illness. Why did Capella not address her aversion to the counseling profession; as long as she is destroying Black students and Ebony clients, they do nothing to rescind her apathetic behaviors. No, Capella goes along with her insanity and concur to punish someone who is a victim of her mental illness. Capella had the audacity to call me unethical for reporting Michelle. As mandated reporters Capella is not addressing nor report that a mentally ill person has a license to counsel people, which violates the law. They must PAY.

All the defendants should be banned from government funded educational institution milieus. I bet if she was Black, Capella would report her to the board. The student felt that he should have had more support from Capella than to go along with such an injustice to the benevolence of a student. The Defendants violated all of the Helping Professional Association's Codes of Ethics, the "Hippocratic Oath, the State's Mandated Reporter Laws, and dishonored the Belmont Report Principles. "Professionals must do no harm." I should be graduating with my peers after this term instead of being bamboozled into being discharged from the program. The reason you must put a stop to the defendants is not everyone is going to take this type of crap off the defendants. Capella took almost a half of a million dollars from me, without me getting my license that I worked on for 11 years.

*The Defendants are going to do it to the wrong person, and you will read about it in the news. They are lucky I am nonviolent and God fearing, or this would not have a happy ending. One day someone is going to fire on them like the "Battle Ship Missouri Bombing Okinawa." They would deserve it. The defendants are too Nazi Racist; audaciously bold, and need to be humbled. They must PAY.*

The only reason Capella is using dilapidated, and phony excuses to discharge me is they are retaliating against me because I complained about the Nazi racism, I experienced in their classroom education milieu. At a Residency, a Professor publicly told me that I should know what it is like in prison because I am Black. She continued to assail, slander, libel, and embarrass me by stating noxiously in public that she lives in a small quite town where a river runs down the middle of the street and there is no crime because Black people do not live in her town. I did not report her racist behaviors at that time in the residency because I knew that Capella would turn around and punish me. The only reason I publicly complained about the Professor's aversive nazi racist prejudice is I competed the course with an A +-100% grade/ 4.0 GPA; the professor placed a B grade on my transcript.

Capella University committed slander, fraud, and libel against me when they assailed me with derogatory language. For no reason, Capella claimed that I am not fit to be a counselor, a danger to society, I am not capable of completing a practicum, I am unprofessional, and Capella has to protect the helping profession and general public from me being in the field because I am a dangerous Black Man. Look out counseling profession here comes the "Big Black Boogeyman." It is ironic because I have pictures with one of the defendants hugging me and smiling (See Exhibit D). They must PAY.

There are hundreds of people who beg to differ. They would attest that it is the opposite of the defendants' claims. First before the defendants made these scandalous, libel, and slanderous assailing claims alluding to me, they did not investigate, talk to, or correspond with anyone alluding to my fitness to be a counselor. I attended the Capella school for 11 years with a 4.00-GPA/A grade the whole time. I achieved the President's list 45 times and earned 45 badges; I have more college credit courses accredited to my name than any man in the world. The defendants are just Jealous that a Black man has more education than them. In their Nazi Racist minds, Black people are supposed be inferior to White people, lazy, and dumb. This Black man surprised these ignorant racist White people. Why did the defendants not explore my character and professionalism by talking to my Professors and classmates. I gave Capella the names and contact information for five licensed professionals and their agencies where I successfully completed over 1200 Practicum/Internship hours before at these agencies. (See Exhibit A). Capella did not call them to verify my professional behaviors. No, Capella did not; all the defendants care about is belittling, assailing, and demeaning me unjustly. The defendant's assessment of me is discriminatory, equivocal, bias, partial, racist, discriminatory, and unjust. This is the most heinous, slanderous, unscrupulous, scandalous, inflammatory, derogatory, lowdown, and racist anyone can imagine. They must PAY.

Capella mentioned that I am incompetent and should be banned from the counseling profession. Presently, I am working as a professional counselor. If you look at the Site Supervisor / CORE-ELMS portal, you will see three Licensed helping professionals who gave and listed their licenses with Capella as a testimony to support me. (See Exhibit A). I am presently working at an internship; professionally counseling over 60 clients under the auspice supervision of an LCSW and several LPC counselors; one has a Ph.D. I am presently working as a volunteer; counseling and serving over 100 Medicaid clients for the State and Federal governments. While working at the present agency as a professional counselor, I took a course and earned certification as an Addiction Specialist. It earned and added the AADC-P title to my name since I have been practicing at my present agency. I can give you the contact information for the erudite Federal Administrators in the Medicaid-CLTC program who will attest to and advocate for my professionalism. It is quite germane that I can give you dozens of people from Lawyers, Medical Doctors, Nurses, Psychiatrists, Pastors, Bishops, Licensed Professional Counselors, Clients, and MSCSWs, who will attest to my positive professionalism.

I guarantee on my life that anyone you talk to will tell you, "I Love Me Some Dr. Nurse." Everyone will decree that I provide wholesome, loving, and nurturing positive professional counseling services. To prove the extreme impetuous of the Defendants heinous racist discrimination, Capella called my present practicum site and told Ms. Carroll to fire me for no

reason. Ironically, and hypocritically they have my site, "The Behavioral Health Group" listed as one of their approved sites in their list of approved sites in the ELMS/CORE – Internet Finder search engine. (See Exhibit C). I completed all the Practicum hours; I still have no degree.

Please call these supervisors who will attest to my belonging in the helping community. I attended Capella for 11 years with a 4.00-GPA./A grade. You could explore and investigate my character and professionalism by talking to my professors and classmates. I am giving you the name and contact information for five licensed professionals and their agencies where I successfully completed over 1200 Practicum/Internship hours before at these five agencies; you can call them to verify my professional behaviors. (See Exhibit A). These helping professionals are:

-Ms. Celia Keys, LCSW  
The Family Counseling Center of the CSRA  
1120 Marks Church Rd, Augusta, GA 30909  
Telephone: (706) 223-0334

-Hon. Dr. Veronica Hartwell Ph.D.  
Aniz Inc. Support Services Agency  
236 Forsyth St SW #300, Atlanta, GA 30303  
(404) 521-2410

I am kindly asking you to please call them to verify that I successfully interned with their staff. I work with, and I am presently under the Supervision auspice of the following Professionals:"  
Amanda Jordan, LPC, LPC-S, LAC, CS - Clinical Director  
BHG Charleston Treatment Ctr.  
2301 Cosgrove Ave. Suite F; North Charleston, SC 29405  
Direct: 843-474-2975 / Office: 843-529-0700 / F: 843-529-1681  
Visit [www.bhgrecovery.com](http://www.bhgrecovery.com)

Cassie Carroll, LISW-CP, AADCP  
Counselor Supervisor  
BHG Aiken Treatment Center  
410 University Parkway Suite 1560, Aiken, South Carolina 29801  
O: 803-573-2119/ F: 803-641-6595  
Visit [bhgrecovery.com](http://bhgrecovery.com)

James Riddle RPh  
Pharmacist-In-Charge  
Behavioral Health Group - Aiken Treatment Center  
410 University Parkway, Suite 1560  
Aiken, SC 29803  
Office: 803-641-6911  
Fax: 803-641-6595  
Email: [James.riddle@bhgrecovery.com](mailto:James.riddle@bhgrecovery.com)

Hon. Dr. Christopher Carkhum, Ph.D. LPC, CMAC, CEMP  
Lif Management Group, LLC.  
2808 Hillcreek Dr, Augusta, GA 30909  
Office: 706733-0333  
Email: ccarkhum@parent.com

EEOC: Case Number – 436202500158

I was born in 1955 in the ghetto of NYC. I had street jobs from working in Law Enforcement and foster care milieus. I witnessed the devastation and atrocities that the heroine, crack, cocaine, and crystal-metaphoremes pandemics have done to communities and families. However, this Fentanyl that comes from China and Mexico is making all three of those pandemics together look like a drop in the bucket. The Fentanyl is tearing up our young people. Fentanyl is seriously destroying and killing people at an alarmingly high rate, especially White youth. It is ripping our children apart. Right now, you need all the counselors, social workers, psychologists, and other helping professionals you can employ to help fight this epidemic. This is no joke business.

I studied and worked hard for over 40 years in the human services profession to get to this point. I authored self-help books. The last thing I want to do is be destroyed just because of my race and gender. I am requesting the following retribution.

- A. I want a mechanical lean on the salaries, bank accounts, properties, and automobiles of all the defendants.
- B. For my family members' and my pain and suffering of emotional stress and psychological trauma, scamming, fraud, slander, and libel inflected by the defendants; I am demanding "**ONE BILLION DOLLARS**" from each of the defendants.

**II. WHEREFORE, plaintiff respectfully requests relief as follows:**

**As a result of impetuously augmenting emotional stress and psychological trauma under the most conspicuous consequences, the Defendants must pay:**

**-Money damages in the amount of \$10 BILLION dollars from each of the 11 defendants, for a total of \$110 Billion dollars.**

**-Plaintiff is also demanding to receive the salaries and pensions of all of the defendants.**

**Plaintiff respectfully requests for Punitive damages an order awarding relief as follows:**

1. Against the Capella University in the amount of \$300 Billion Dollars.
2. Against the all of the Defendants in the amount of \$300 Billion Dollars.
3. Against the President of Capella University: **Dr. Constance St. Germain** in the amount of \$300 Billion Dollars.

**IV. The Plaintiff is suing the defendants for a summary total of “ONE TRILLION and 100 BILLION DOLLARS.”**

**With all due respect, the Plaintiff is kindly asking the court to please allow him to practice counseling without a formal licensure; (it is legal to do so because the Plaintiff is a doctor) to pay off his student loan debt.**

Please take notice that the Plaintiff demands trial by jury in this action.

Dated: 11/18/2024  
11/18/2024

**Dr. Ronald A. Nurse AAS, BS, MS, Ph.D. AADC-P**  
*Dr. Ronald A. Nurse Ph.D.*  
Plaintiff

**Racism is going to destroy America like a Cancer.**